

# SUMMARY TABLE OF TITLE V PERMITS “ROADBLOCKS”

draft 6/11/98

(98 of 116 permitting agencies provided comments -- including 10 agencies who  
said they had no roadblocks)

Reason	Permitting Authorities	# of PA's	ROs *
<b><i>INTERNAL STATE ISSUES</i></b>			
<b>1. PERSONNEL AND MONEY ISSUES</b>			
Difficulty Hiring and Keeping Staff	MA, ME, NH, RI, VT, DE, MD, WV, GA, NC, NC-Forsyth, NC- Mecklenburg, NC-Western, IN, OH, WI, NM-Albuquerque, LA, OK, NM, MO, NE, CO, MT, WY, CA- Amador, CA-Feather, CA-Kern, CA- Mendocino, CA-Mojave, CA-Placer, CA-Santa Barbara, CA-Shasta, CA- Yolo-Solano, AZ-Maricopa, NV- Clark, NV-Washoe, HI, WA-CRO, WA-Northwest, WA-Spokane, OR- Lane, AK	43	1, 5, 10
Training Staff (including knowledge of new and existing app reqs)	MA, GA, KY, MI, WI, NM- Albuquerque, IO, NE, CO, WA- Northwest, OR-Lane	11	1, 2
Limited Resources	CA-Amador, CA-Kern, CA-Mojave, CA-Placer, CA-Shasta, AZ- Maricopa, OR-Lane	7	
Inadequate Fee	OK, CA-Feather	2	
Office Reorganization	MT, AK	2	
Agency Funding Approval From State Legislature Delayed	WV	1	
Cuts in 105 Grants and Cyclical Fees Collection	ME	1	

<b>Reason</b>	<b>Permitting Authorities</b>	<b># of PA's</b>	<b>ROs *</b>
Economic Slump	HI	1	
City Council and Mayor Limited Hiring	NM-Albuquerque	1	
Legislature Effort to Disband Agency	OR-Lane	1	
<b>2. ADMINISTRATIVE</b>			
Review of Applications	MA, RI, NC, NC-Forsyth, NC-Mecklenburg, NC-Western, IL	7	1, 2
Absence of Pre-existing Op. Permit Program	WV, MI, NM, WA-Puget, WA, WA-Northwest	6	10
Developing Data Management System	MI, MN, OH, WI, MT, UT	6	5
Merging Programs (NSR, VOC emissions trading, Acid Rain, pre-existing operating permit programs) Adds Extra Complexity	ME, IL, WI, UT, OR, OR-Lane	6	
Identifying T5 Sources and Non-Sources	IN, CO, UT, OR, AK	5	<b>10</b>
Developing Implementation Guidance	MI, CO, UT, OR	4	
T5 Program Complexity	RI, OR-Lane	2	2
Source Deciding What Controls Are Needed	WA-Benton	1	
New Source Became Subject	WA-Southwest	1	
It's A Growth and Change Process	NM	1	
<b>Applications</b>			
Developing Application Format	MA, WV, GA, WY	4	
Applications Not Processible or Needing Additional Information	IL, NV-Clark, WA-Spokane	3	
Review of Toxic Emissions	CA-Yolo-Solano	1	
Claims of CBI by Applicants	IL	1	

<b>Reason</b>	<b>Permitting Authorities</b>	<b># of PA's</b>	<b>ROs *</b>
Applications Not Due Until End of Year 1	MO	1	
<b>Permits</b>			
Permit Processing, including Internal Review and Review of Comments (i.e., underestimating amount of time needed)	NH, RI, NY, AL-Jefferson, FL, KY, NC, NC-Forsyth, NC-Mecklenburg, NC-Western, IL, IN, MN, WI, UT, LA, CO, CA-Modoc, CA-Shasta, CA-Sonoma, CA-Yolo-Solano, AZ-Pima, WA-CRO, WA-Olympic, WA-Spokane, OR, OR-Lane	27	1, 2, 5, 10
Working With And Scrutiny By Regulated Community	MD, FL, GA, KY-Jefferson, NC, NC-Forsyth, NC-Mecklenburg, NC-Western, IN, OH, IO, NE, CO, UT, CA-Modoc, WA-Puget, WA-Yakima, WA, OR, ID	20	10
Developing Periodic Monitoring Terms & Conditions	<b>KY</b> , NC, NC-Forsyth, NC-Mecklenburg, NC-Western, IN, CO, UT, CA-Ventura, OR	10	
Complexity of Sources	VT, IN, MN, LA, UT, WA-Industrial, WA-Nuclear, OR-Lane	8	5
Drafting NSPS/MACT Into Permits	VT, MS, NC, NC-Forsyth, NC-Mecklenburg, NC-Western, MI	7	
Developing Standard Terms & Conditions; Model Permits	SC, IN, IO, CO, ID, AK	6	
Training Seminars for Industry	NC, NC-Forsyth, NC-Mecklenburg, NC-Western, WY	5	
Compliance Issues (including fixing them before permit issuance)	AL-Jefferson, KY, WA, WA-Spokane	4	
Ongoing Changes to Facilities	AL-Jefferson, CA-Sacramento, CA-San Joaquin Valley	3	
Permitting Most Complex Sources First	MN, UT	2	
Developing Permit Format	MA, IN	2	
Diversity of Sources	NM-Albuquerque, UT	2	

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Emission Factors, Including Revising	TN, WA-Southwest	2	10
Building Flexibility Into Permits	MD, MN	2	
Local Agency Working With State	OR-Lane	1	
Negotiating MRR Requirements	CA-San Joaquin Valley	1	
California Variance Issue	CA-San Diego	1	
Determining Basis for Requirements	CA-San Joaquin Valley	1	
Participation in P4 Project	WA-Olympic	1	
Decision to Observe Progress of Other PAs First	AL	1	
Need to Translate Permits Into Spanish	PR	1	
<b>3. REGULATORY</b>			
Clean Up of Existing Regulatory Requirements	MA, NE, OR, <b>WA- Southwest</b> , WA-Northwest, OR-Lane	6	10
Applicable Requirements Created in Minor NSR Program	WA, WA-Northwest	2	
Complexity of MACTs	MA	1	1
Determining Appropriate Level of Detail	MI	1	
Section 112/T5 Interface	LA	1	
<b>4. COMPETING PRIORITIES</b>			
Issuing Synthetic Minor Permits	RI, DE, MD, FL, <b>GA</b> , KY, <b>KY-Jefferson</b> , MS, NC, NC-Forsyth, NC-Mecklenburg, NC-Western, SC, TN, IL, IN, MI, MN, WI, AR, KS, SD, UT, WA-Puget, WA, WA-Spokane, OR-Lane	27	1, 5, 10

<b>Reason</b>	<b>Permitting Authorities</b>	<b># of PA's</b>	<b>ROs *</b>
Issuing NSR Permits (including sources that had failed to submit applications originally)	ME, VT, WV, KY, NC, NC-Forsyth, NC-Mecklenburg, NC-Western, IL, WI, OK, MO, NE, CO, MT, NV-Clark, WA-Northwest, WA-Southwest, OR-Lane	19	5, 10
Issuing Acid Rain Permits	MA, NC, NC-Forsyth, NC-Mecklenburg, NC-Western	5	
Issuing PSD Permits	NC, NC-Forsyth, NC-Mecklenburg, NC-Western, NE	5	
Staff Work on More Than One Medium	VI, WA-Industrial, OR-Lane	3	
Modifications to Existing T5 Permits	ND, OR	2	
Fixing Interim Approval Issues	AK, FL	2	
Enforcement Actions	WA-Northwest, OR	2	
Other Permitting, Inspection, and Enforcement Activities	AL	1	
Section 114 Investigation of 3 Sources by Regional Office	WA-Northwest	1	10
Providing Documentation When Industry Pushed to Repeal T5	GA	1	
<b><i>ISSUES DUE TO EPA</i></b>			
<b>1. INTERACTION WITH EPA</b>			
Time Spent Working With RO	NJ, PR, DE, MD, FL, TN, AR, CA-Colusa, CA-Ventura, WA, WA-Northwest, WA-Yakima, OR-Lane, AK	14	2
Outdated SIPs (including demonstrating compliance with them)	CA-San Diego, CA-San Joaquin Valley, CA-Tuolumne, CA-Yolo-Solano, AZ	5	
Resolving Issues In Draft Permits	NJ, FL, CA-Colusa, CA-El Dorado, CA-Kern	5	
Delays in Approving SIP Revisions	CT, NY	2	

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Time Spent Reviewing EPA Comments	AL-Jefferson, FL	2	
RO's Objection to Permits	NJ	1	
Late Comments from RO on Draft Permit	WA-Puget	1	
EPA Looking at Old NSR Conditions	CT	1	
<b>2. CONFLICTS, DELAYS IN POLICY/GUIDANCE</b>			
Periodic Monitoring (late guidance and inconsistent policies)	CT, ME, NH, MD, <b>KY</b> , MS, SC, TN, KS, ND, UT, WY, CA-San Diego, CA-Ventura, WA, OR, WA-Northwest, OR-Lane	18	2, 10
White Papers -- Too Late; Confusing; Time Needed To Implement; Too Cumbersome	NH, VT, WV, FL, GA, MS, SC, MI, MN, CO, WY, CA-Placer, WA-Puget, WA, OR, OR-Lane	16	10
Delays In Revising Part 70 Rule (and giving status updates)	CT, MD, <b>AL</b> , GA, KY-Jefferson, <b>MS</b> , NC, NC-Forsyth, NC-Mecklenburg, NC-Western, MI, KS, MO, NV-Washoe	14	2, 5, 10
Lateness and/or Lack Of Guidance (fugitives, PM/PM10, IEU's, enhanced monitoring, 112(r), MACT implementation, level of detail)	CT, MD, WV, <b>AL</b> , MS, SC, KS, WY, CA-Lake, WA-Puget, OR, WA-Northwest, OR-Lane	13	2, 5, 10
CAM -- Controversy and Need for Guidance	WV, <b>AL</b> , IL, IO, KS, MO, WA-Northwest, WA-Olympic, WA-Puget	9	
Inconsistency Within EPA About Regs, Policy & Guidance	ME, VT, CA-Butte, CA-Sacramento, WA-Puget, OR-Lane	6	2, 10
Problems in Defining PTE	<b>AL</b> , CA-Lake	2	
Federal Enforceability	CA-San Diego, CA-Shasta	2	
Confusion About Deferrals of Non-Majors	CT	1	
Confusion About Extensions of Interim Approvals	CT	1	

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Timing of Transition Guidance	MS	1	
Too Much Attention to IEUs	CA-Sacramento	1	
Confusion About Title 1/T5 Interface	CT	1	
Disagreement Within EPA About Level of Detail	PR	1	
Unclear Direction from EPA-HQ on Parametric Monitoring	WA-Industrial	1	
<b>3. APPLICABLE REQUIREMENTS</b>			
Ongoing Development of New Applicable Requirements (CAM, 112(g), MACT)	CT, MA, ME, VT, FL, MS, IL, NM, KS, UT, CA-Butte, CA-San Joaquin, NV-Clark, WA-Northwest, WA-Spokane, WA-Southwest	16	1, 2, <b>10</b>
RO Adding New Requirements For PA to "Fix" Outside of Those ID'ed in Interim Approval	CT, ME	2	
Changes to Ambient Standard	SD	1	
Conflicting Federal Rules (old NSPS v. stricter MACT)			2
Hard to Understand Rules			2
<b>4. CAA -- STATUTE</b>			
Unrealistic Timeline	VT, WI, WY, OR-Lane	4	2, 5
<b>5. MISCELLANEOUS</b>			
No Training of States by EPA	CT, MS, NM-Albuquerque	3	
<b>PERMITTING AUTHORITIES REPORTING NO ROADBLOCKS</b>	AL-Huntsville, TN-Chattanooga, TN-Knoxville, TN-Memphis, TN-Nashville, CA-Lassen, CA-Monterey Bay, CA-San Luis Obispo, AZ-Pinal, WA-ERO	10	

Reason	Permitting Authorities	# of PA's	ROs *
<b>PERMITTING AUTHORITIES PROVIDING NO COMMENTS</b>	District of Columbia, PA, VA, TX, NE-Lincoln-Lancaster, NE-Omaha, CA-Bay Area, CA-Calaveras, CA-Glenn, CA-Great Basin, CA-Imperial, CA-Mariposa, CA-N. Coast, CA-N. Sierra, CA-Siskiyou, CA-South Coast, CA-Tehama, NV	18	

\*Means the numbered regional office noted in its transmittal memo that the reason was significant in general for permitting authorities in its region.

**Bolded State, local or Regional Office abbreviation means that the permitting authority or Regional Office considered that particular roadblock to be one of the most significant impediments to timely permit issuance.**